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*Attorneys for Defendant  
Taasera Licensing LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

## MEMO ENDORSED

Defendant Taasera Licensing LLC's motion to dismiss, Doc. 32, is denied without prejudice. Defendant is directed to file a letter requesting a pre-motion conference in connection with its motion to dismiss pursuant to the Court's Individual Practices. It is SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: June 1, 2022

New York, New York

PALO ALTO NETWORKS, INC.,

Plaintiff,

v.

TAASERA LICENSING LLC and QUEST PATENT  
RESEARCH CORPORATION,

Defendants.

Case No. 1:22-cv-02306-ER/SDA

### NOTICE OF MOTION

### ORAL ARGUMENT REQUESTED

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of Defendant Taasera Licensing LLC's Motion to Dismiss Palo Alto Networks, Inc.'s ("Palo Alto" or "Plaintiff") First Amended Complaint (D.I. 21) for Declaratory Judgment of Non-Infringement and all prior pleadings and proceedings had herein, Defendant Taasera Licensing LLC hereby moves this Court, at a time and date determined by the Court, for an order (i) pursuant to 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure (a) granting dismissal of Plaintiff Palo Alto Networks, Inc. First Amended Complaint (D.I. 21) for Declaratory Judgment of Non-Infringement relative to Defendant Taasera Licensing LLC in its entirety, and (b) a determination of no alter ego exists between defendants Taasera Licensing LLC and Quest Patent Research Corporation, and

(ii) granting such other and further relief as the Court deems just and proper.

Dated: Rye, New York  
May 31, 2021

Respectfully submitted,

**FABRICANT LLP**

By: /s/ Alfred R. Fabricant  
Alfred R. Fabricant

*Attorneys for Defendant  
Taasera Licensing LLC*

TO: Counsel for Defendant (by ECF)